

EPA Reviewer (Consolidated comments, 3 reviewers)

Tribe/Proposal: Swinomish – Non-Point Pollution Public Info & Education

The following are consolidated comments from 3 EPA reviewers.

1) More substantive detail would better enable constructive review. Section B (“Project Tasks, Outputs and Outcomes”) provides only very basic information about process, but does not provide substantive information about the tasks that would help us provide more constructive input. The applicant should summarize what has been learned from Year 1 efforts so far to provide some of this substantive information and context. Specifically, more detail on what has been learned or accomplished so far in the identification of target audiences and general message development would be helpful in Section B. This information would help reviewers evaluate whether the proposed work will affect behavioral changes in individuals that would lead to decreased impact on the ecosystem.

2) Partnerships. One overall recommendation we had for the Year 1 proposal was for the applicant to reach out to more potential partners. Given the extensive other activities occurring in the Skagit (see those that we summarized in our Year 1 comments), and existing/evolving relationships among these players, how will progress happen with the proposed work if other players with a significant role in land use and practices are not involved in any way?

3) Communication with Puget Sound Partnership outreach and education program. We appreciate the applicant’s awareness and consideration of the Partnership’s efforts (p. 2, bottom, “While PSP currently engages in a Puget-Sound-wide public outreach and education campaign...we have deemed that this project is necessary to garner support for additional mechanisms to protect and restore water quality and fisheries resources within the Skagit Watershed”). While the additional work undertaken by the tribe may well be above and beyond anything the Partnership is currently undertaking, we still wish to encourage the Tribal staff to contact the PSP (Dave Ward specifically) to at least communicate about respective efforts, and possibly find areas where the two organizations can consult with and coordinate efforts. PSP is doing a lot of research and they are already conducting regional surveys through the large outreach, education and stewardship grant they are implementing. PSP also has funds in their grant for social media and other outreach mechanisms for region wide messaging and then they are working with the local Eco-Net works for local messaging. They are also providing social media kinds of training for the Eco-Nets - they have developed a partnership with qualified trainers at the University of Washington (perhaps this is the training mentioned on p. 7 of the proposal? If not, the applicant might consider this training).

4) A sound approach to achieve the objectives of the "Eligible Activities" would focus on behavior. Such as informing people on how to comply with rules and regulations, and raising public awareness for the purpose of reducing the discharge of non-point source pollution into surface streams. Or, as stated in Activity E.4. "encourage individual stewardship."

5) Comment on Task 2. Who is your target market? Five print ads in Washington newspapers could mean advertising in the Seattle Metro area, which is very expensive and probably not addressing your target market. Advertising in the Skagit Valley Herald or the numerous weeklies in the area would allow more than 10 full page ads.

6) Comment on Task 3. What was the basis for estimating costs for ad campaigns on social media platforms? Social media advertising is very inexpensive. Have they any data on how many ads on which networks, and to identified audiences?

7) Comment on Task 4. What was the basis for estimating costs for development of print, online and audio materials? Creating content is very expensive. They list development of audio materials, but no video. Not sure where the audio is going to be used. Podcasts? Radio PSA's? Video tends to be more viral and can be integrated into the numerous social media platforms listed in Task 3.

8) Comment on budget: Should "Direct Costs" include the Professional Services line item?

9) Lobbying. Federal laws, regulations, and Office of Management and Budget (OMB) Circulars control the use that can be made of Federal funds for political activity, including lobbying. In reviewing the proposal and relevant regulations, we believe that the proposed work would not violate the anti-lobbying provisions of 40 C.F.R. part 34, which is incorporated into EPA's cooperative agreement with NWIFC.

However, there may still be public perception issues related to the proposed tasks and how they relate to lobbying. For example, 8.b. first paragraph says the work will entail: "...one-on-one meetings with stakeholders and elected officials to inform a target audience capable of influencing public opinion and policy." On 8.b.6. the proposal mentions "direct person to person outreach with community leaders and organization executives to discuss findings and to solicit support." Furthermore, the proposal states on p. 2, under "Need for Project," that "there has been little local support for adoption or enforcement of regulations to meet water quality standards...While PSP currently engages in a Puget Sound-wide public outreach and education campaign...we have deemed that this project is necessary to garner support for additional mechanisms to protect and restore water quality and fisheries resources within the Skagit Watershed.

It might be appropriate, in light of possible public perception concerns, that the origins of the proposed work in the Skagit Chinook Recovery Plan, and the Puget Sound Action Agenda, be highlighted even more strongly than they already are in the proposal. Providing this context would allow a reader to see (if I am correct in my understanding) that this work actually could be said to implement the Recovery Plan and Action Agenda (rather than constituting a grass roots lobbying effort conceived of by the applicant). I am thinking of two passages in particular from the 2008 Action Agenda, and the 2005 Recovery Plan, that support this perspective:

Implement the regional salmon recovery plans as an integral part of Puget Sound restoration. The salmon recovery plans are a cornerstone of the efforts to improve the health of the Puget Sound ecosystem. The data, planning, and community commitment that have gone into the recovery plans overlap with and

complement Puget Sound recovery efforts. The Puget Sound Partnership is responsible for implementing the regional salmon recovery plans for Chinook and summer chum salmon that have been approved by the National Oceanic and Atmospheric Administration (NOAA) (p. 6, 2008 Action Agenda).

And, from p. 78 of the Skagit Chinook Recovery Plan 2005:

Successful habitat protection depends on three important components. First is a public that recognizes the importance of salmon habitat protection, and that does not condone actions by others that do harm to these resources. This sentiment should be nurtured through a vigorous public information effort, and by providing the technical information to assist landowners and others in their efforts to comply with existing regulations. Technical and financial resources should also be made available to those who voluntarily want to do even more to protect and restore salmon habitat if they so choose. Providing people with the information to make informed decisions that will be protective of salmon habitat when working in and around streams is the first step towards habitat protection. To summarize, providing people the tools to “do the right thing” capitalizes on the vast majority of the public that wants to provide for a future for Skagit River Chinook.

A second factor and one that needs to be implemented concurrently with the first step is an unambiguous regulatory framework that insures that the habitat needs of the fisheries resource are fully protected, either through avoidance of impacts or through the full mitigation of unavoidable impacts. The regulations should provide sufficient clarity to landowners and other project proponents about what standards need to be met, and what actions are unacceptable. These regulations must be applied equally to all, with assistance from implementing agencies so that people can understand the necessity of the regulated actions, and how they can comply.

Finally, there needs to be an enforcement presence to insure that those that choose not to follow the rules will be held accountable. This is important for a number of reasons. First and foremost, vigorous enforcement provides a deterrence to those that might otherwise try to circumvent or ignore existing regulations. Also important is that an active enforcement process indicates to those that are abiding by the rules that others will be held to a similar standard, and that there is an even playing field for everyone that needs to work in and around streams. Finally, a vigorous enforcement presence indicates to the public that these matters are an important public policy, and that the authorities with jurisdiction take their responsibilities seriously and are committed to ensuring that salmon protection is an important priority.

If consistent with the applicant’s aims and purpose, perhaps these passages could be integrated into the proposal.